

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMY SPAHR
AND MATTHEW CAIN

Plaintiff,

V.

AMY COLLINS, ET AL.

Defendants.

C.A. No. 19-113-MN

TRIAL BY JURY DEMANDED

STIPULATION TO AMEND COMPLAINT

COMES NOW, the Plaintiffs, Amy Spahr and Matthew Cain, by and through their attorney, Ronald G. Poliquin, and the Defendant, Amy Collins by and through her attorney, Robert Kleiner, Esq., hereby stipulate and agree to the following:

1. Plaintiff was originally tasked with filing Amended Complaint on or before January 7th, 2022.
2. As a result of sickness and weather issues, Plaintiff requests until January 14, 2022 to file the Amended Complaint.
3. Opposing party does not oppose the extension.
4. Plaintiff respectfully requests until January 14th, 2022 to file the Amended Complaint in the above case.
5. Defendants have until February 14, 2022 to file a responsive pleading and/or pre-answer motion.

THE POLIQUIN FIRM, LLC

/s/ Ronald G. Poliquin, Esq.
Ronald G. Poliquin, Esq. (#4447)
1475 S. Governors Ave.
Dover, DE 19904
302-702-5501
Attorney for Plaintiff
Date: January 10, 2022

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Robert Kleiner, Esq.
Robert Kleiner, Esq (#5505)
Deputy Attorney General
Defensive Litigation Unit
820 North French Street, 6th Floor
Wilmington, De 19801
Attorney for Defendant
Date January 10, 2022

SO ORDERED, this ___ day of _____, 2021.

The Honorable Maryellen Noreika
United States District Judge